

FILED IN CHAMBERS  
U.S.D.C ATLANTA

Date: Apr 10 2025

**United States District Court**  
NORTHERN DISTRICT OF GEORGIAKEVIN P. WEIMER, Clerk  
By: Jeff Redding  
Deputy Clerk

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT**

Aliakbar Mohammad Amin

Case Number: 1:25-MJ-376

**UNDER SEAL**


I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. Between on or about March 29, 2025, and April 8, 2025 in Gwinnett County, in the Northern District of Georgia, defendant(s), consciously disregarding a substantial risk that his communication would be viewed as threatening, knowingly transmitted a communication in interstate and foreign commerce that contained a threat to injure the person of another,

in violation of Title 18, United States Code, Section(s) 875(c).

I further state that I am a(n) Task Force Officer and that this complaint is based on the following facts:

PLEASE SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof. Yes

  
 Signature of Complainant  
 Michael Cifu

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to me by telephone pursuant to Federal Rule of Criminal Procedure 4.1.

April 10, 2025

Date

at Atlanta, Georgia

City and State

LINDA T. WALKER

UNITED STATES MAGISTRATE JUDGE

Name and Title of Judicial Officer

AUSA Erin N. Spritzer /

Erin.Spritzer@usdoj.gov

  
 LINDA T. WALKER  
 UNITED STATES MAGISTRATE JUDGE

I, Michael Cifu, depose and say under penalty of perjury as follows:

### **INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application for the issuance of a criminal complaint and arrest warrant for Aliakbar Mohammad AMIN for a violation of Title 18, United States Code, Section 875(c) (threats by interstate communication).

2. I am an “investigative or law enforcement officer of the United States” within the meaning of 18 U.S.C. § 2510(7). Therefore, I am empowered to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. I am a Task Force Officer with the Joint Terrorism Task Force (JTTF), and have been since 2023. I have received training in interviewing and interrogation techniques, arrest procedures, search and seizure, search warrant applications, conducting physical surveillance, analyzing telephone and electronic pen register and caller identification records, undercover operations, and electronic surveillance procedures. I am currently assigned to the FBI Atlanta Field Office. As part of the Joint Terrorism Task Force (JTTF), I am responsible for the investigation of domestic and international terrorism activities. I have investigated federal criminal violations which are intended to intimidate or coerce a civilian population, influence the policy of a government by intimidation or coercion, or affect the conduct of a government by mass destruction, assassination, or kidnapping. Through my training and experience, I have become knowledgeable in the tactics and techniques used by domestic and foreign terrorists and others who perpetrate or threaten acts of violence, including the means by which such individuals communicate and plan operations. As part of these investigations and others, I have participated in physical surveillance, conducted interviews, served subpoenas, and executed search, seizure, and arrest warrants.

### **SOURCES OF INFORMATION**

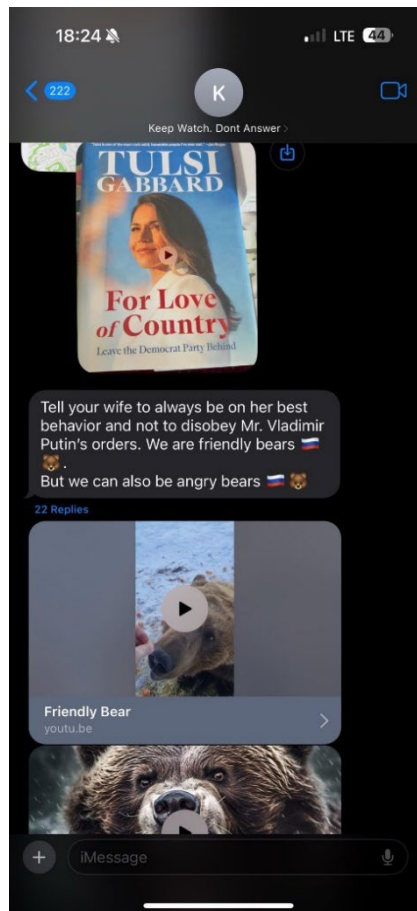
4. The information set forth in this affidavit is based upon my experience, training, personal knowledge, observations, and consultations with other law enforcement personnel and other sources of information related to this investigation. This affidavit does not include all of the facts known to me regarding this investigation, only those sufficient to establish probable cause that federal laws have been violated.

### **PROBABLE CAUSE**

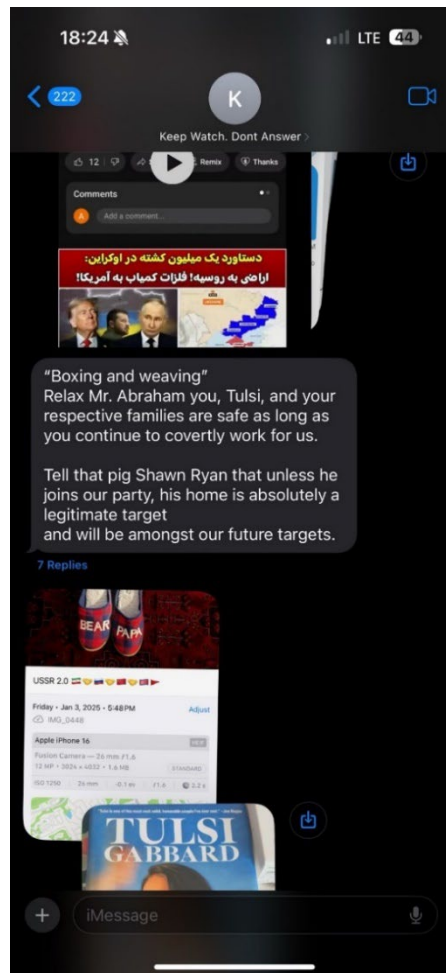
5. On March 29 and March 30, 2025, the FBI received information that AMIN contacted Director of National Intelligence Tulsi Gabbard and her husband, Abraham Williams, to make threats. Specifically, AMIN was expressing threatening rhetoric and sending screenshots of Anti-American social medial content. AMIN made unsolicited direct contact with Williams through cellular text messages and sent a direct message to DNI Gabbard on the social media platform X. AMIN utilized X handle: @Ali\_kb110, and Signal Phone #: 470-621-1658. As of April 4, 2025, database queries telephone number 470-621-1658 is associated with AMIN.

6. Between March 29 and April 1, 2025, Abraham Williams received the following text messages from AMIN:

- a. A message with a picture of DNI Gabbard which states “Tell your wife to always be on her best behavior and not to disobey Mr. Vladimir Putin’s orders. We are friendly bears [Russian Flag + Bear emoji]. But we can also be angry bears [Russian flag + bear emoji]



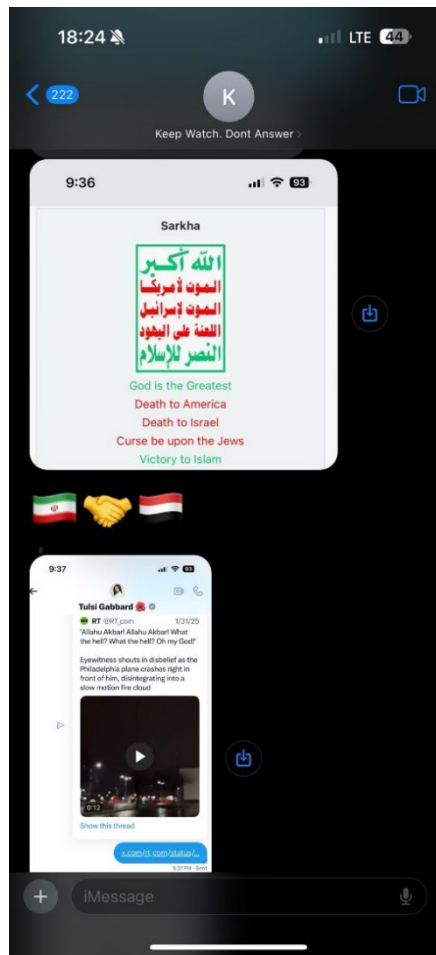
- b. Screen shots and/or videos containing images of President Trump, Vladimir Putin, Arabic writing, and maps of Europe, and the text
- “Boxing and weaving. Relax Mr. Abraham you, Tulsi, and your respective families are safe as long as you continue to covertly work for us. Tell that pig Shawn Ryan that unless he joins our party, his home is absolutely a legitimate target and will be amongst our future targets.”



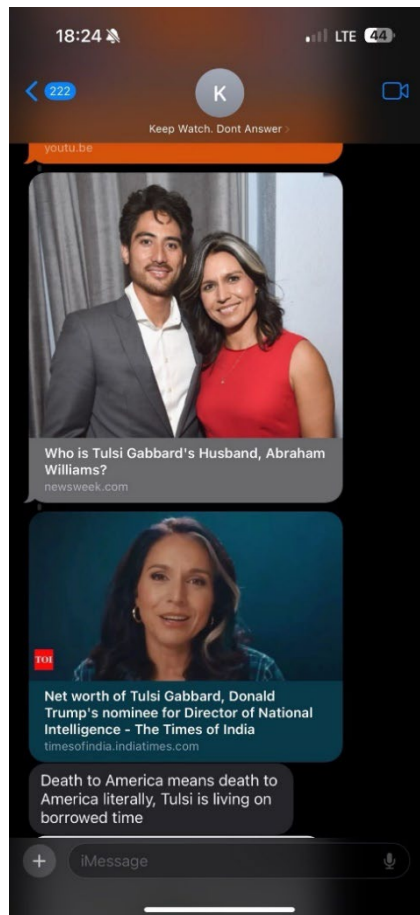
- c. Texts which stated: "You and your family are going to die soon." And "I will personally do the job if necessary." The texts were accompanied by a link to videos about flight training and a link to a video titled "Really realistic plane crash sound effect."



- d. An image of the Sarkha, the motto of the Houthis, which states “God is the Greatest, Death to America, Death to Israel, Curse be upon the Jews, Victory to Islam,” and screenshots of tweets from DNI Tulsi Gabbard.

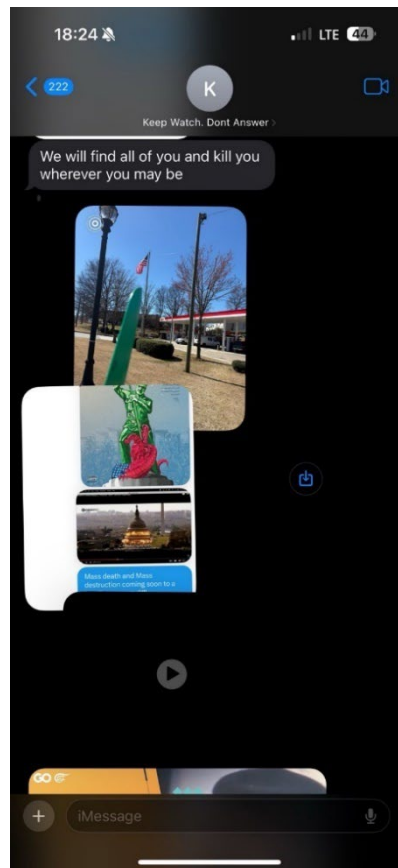


- e. Links to Newsweek and Times of India articles about DNI Gabbard and the text “Death to America means death to America literally, Tulsi is living on borrowed time”

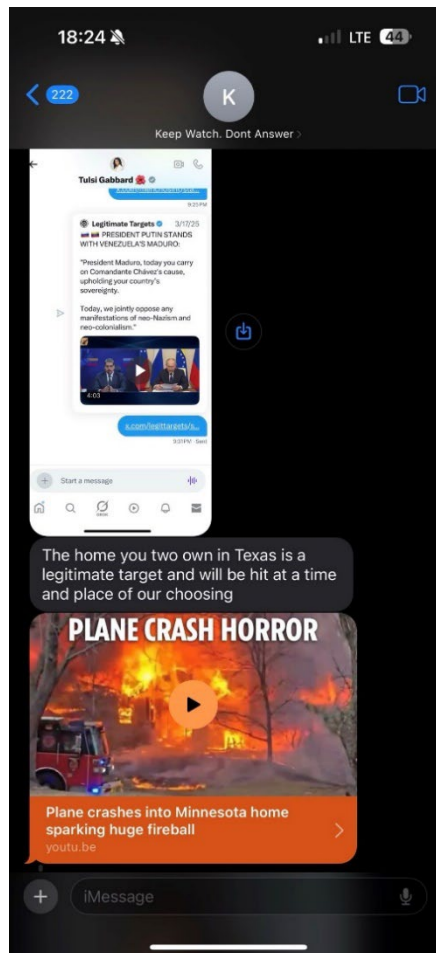


- f. The text “We will find all of you and kill you wherever you may be” and images of a gas station with a blue/teal object, cartoon images of statues, and a CGI image of the US Capitol Building blowing up. Under the image of the Capitol, the words “Mass death and Mass destruction coming soon to a” are visible.

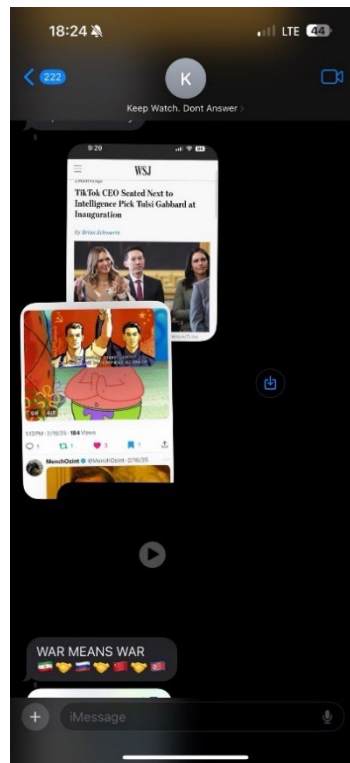




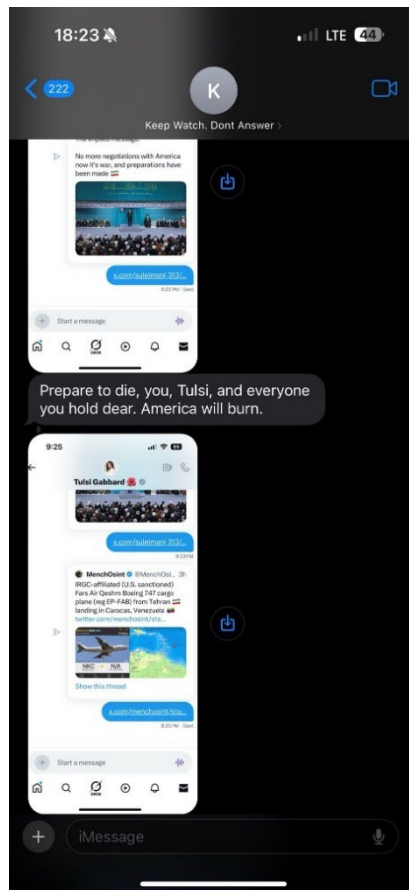
- g. The text “The home you two own in Texas is a legitimate target and will be hit at a time and place of our choosing” with screenshots of DNI Gabbard’s social media posts and a link to a video titled “Plane crashes into Minnesota home sparking huge fireball.”



- h. Links to Wall Street Journal articles about DNI Gabbard, screenshots of SpongeBob SquarePants memes with foreign language cartoons and the text “Our victory will be celebrated worldwide.” An additional text says “WAR MEANS WAR” and emojis for shaking hands, Iranian, Russian, Chinese, and North Korean flags.

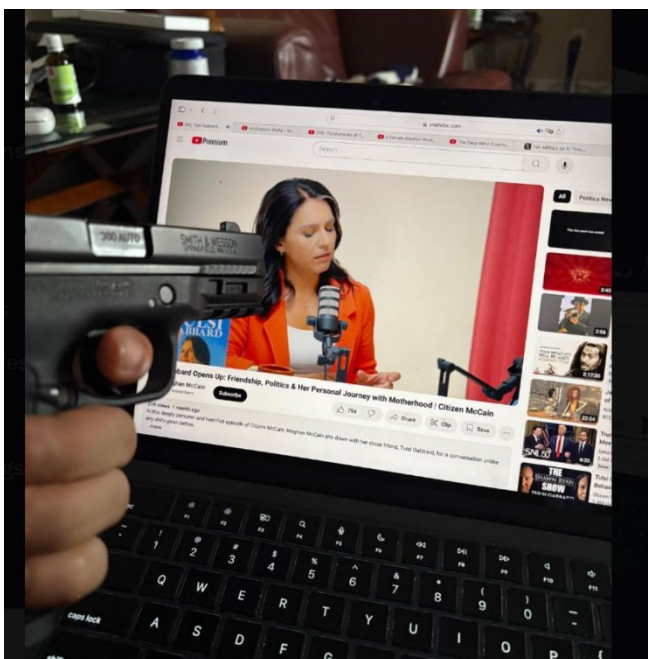


- i. The text “Prepare to die, you, Tulsi, and everyone you hold dear. America will burn” and screen shots from social media posts. Specifically, one of the screen shots appears to be from an account titled “Suleimani 313” and states “No more negotiations with America now its war, and preparations have been made.”



7. In addition to the direct messages sent by AMIN, a review of his social media accounts revealed the following posts:

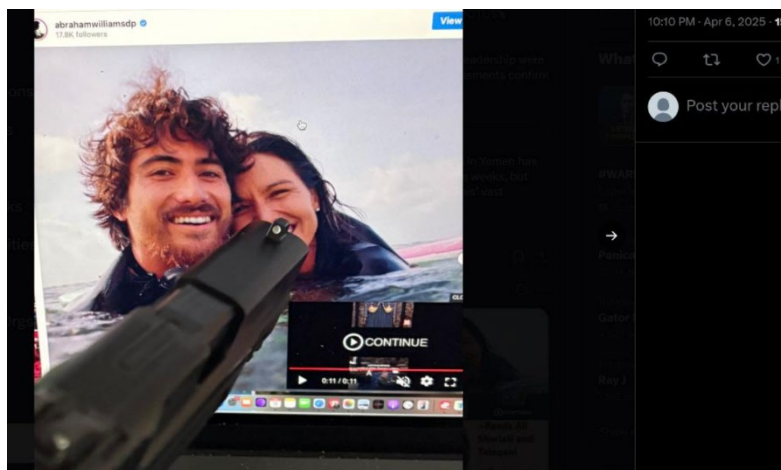
- a. AMIN posted an image of a firearm pointed at an image of DNI Gabbard on a laptop computer. A finger is visible on the trigger.



- b. On April 2, 2025, AMIN posted a cartoon image of X account, @/ر علی Ali\_kb110, and Gabbard's Instagram account of a man with an Iranian flag stabbing a dragon with resembled the American flag.



- c. On April 6, 2025 AMIN posted an image of X account, @/ر علی Ali\_kb110, and Gabbard's Instagram account a firearm pointed at an image of DNI Gabbard and Williams.



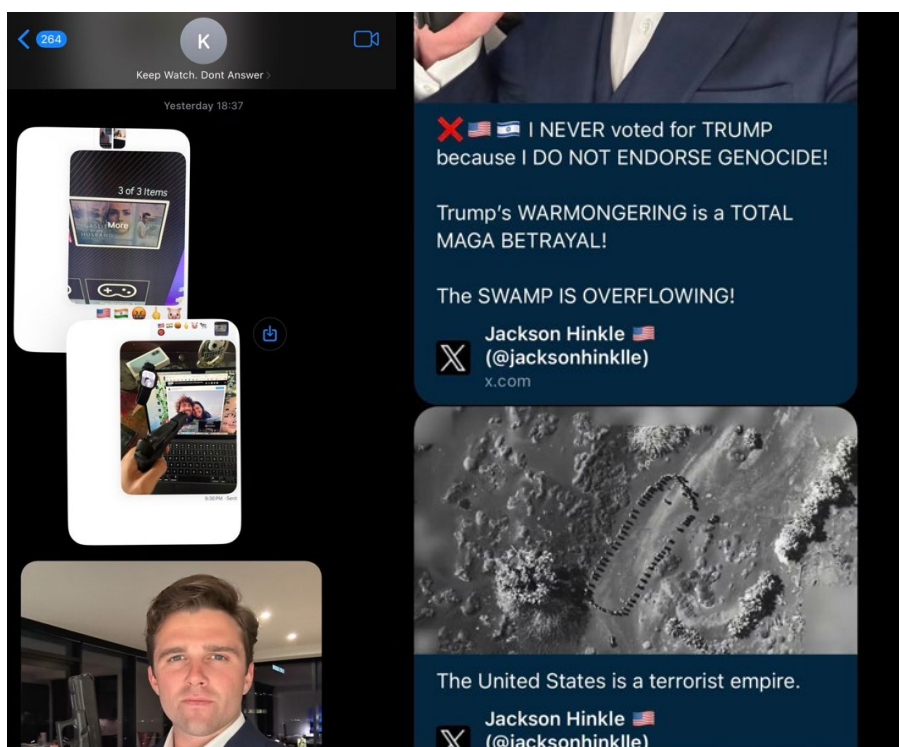
- d. On April 6, 2025 AMIN posted multiple images on X which included an image of a man with the words: “I dream of a great war of justice that will turn American soil to ashes,” the gun pointed at DNI Gabbard and Williams, a hammer and sickle, and a meme which stated “>Reads Ali Shariati and Taleqani >Compares Shia economics to Socialism.” Both Shariati and Taleqani are famous figures in Iranian history.



- e. On April 7, 2025 AMIN posted on X “Burn in hell you satanic Massoud family cult follower” which had images of a man with the words: “I dream of a great war of justice that will turn American soil to ashes” “USA is the great Satan,” a NATO emblem, and images of a foreign military.



8. FBI Atlanta obtained additional images of the messages sent to Williams. Specifically, on April 6, 2025, Williams received a text, which depicts a gun held up to a computer screen displaying a photograph of DNI Gabbard and Williams.



9. On April 8, 2025, members of the Atlanta JTTF interviewed AMIN at his home in Lilburn, Georgia. During the interview, AMIN admitted to sending the threats to



DNI Gabbard and Williams, and expressed that it was because he was frustrated with US Foreign Policy related to Gaza. AMIN admitted that the photos including the guns were his hand, on his gun, in his home. AMIN further stated that he understood that DNI Gabbard and Williams would interpret these messages to be death threats. AMIN stated that his mother had recently taken his gun away, and that it was kept at a storage locker at the DeKalb Farmer's Market employee lockers (investigators have been unable to confirm the exact location of the aforementioned firearm).

### **CONCLUSION**

10. Based on the foregoing facts, I submit there is now probable cause to believe that between on or about March 29, 2025, and April 8, 2025, AMIN violated Title 18, United States Code, Section 875(c) (threats by interstate communication).